

2724-675

2/25/2014

1/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 25, 2014

Ms. Nancy Huebl  
Wellmark International  
1501 East Woodfield Road  
Suite 200 West  
Schaumburg, Illinois 60173

Subject: Amendment: Combining Approved Labels (dated 9/9/13, 5/5/11, 6/15/11, 8/11/11  
and 2/11/13)  
Premium Roach Spray  
EPA Reg. No. 2724-675  
Your Submission Dated November 4, 2013

Dear Ms. Huebl :

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at [Alexander.bewanda@epa.gov](mailto:Alexander.bewanda@epa.gov) or (703) 305-7460.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken  
Product Manager Team 10  
Insecticide Branch  
Registration Division (7505P)

Enclosure

2/11

**SUBLABEL A – OCCUPATIONAL USE**

**PREMIUM ROACH SPRAY**

**Alternate brand name: Zoëcon® Zenprox® Aerosol**

For use in and around homes, garages, kennels, out buildings, barns, and apartment buildings, and the non-food/feed areas of hotels, stores, warehouses, office buildings, schools, nursing homes, hospitals, industrial buildings, vessels, rail cars, trucks, trailers, and aircraft (do not use in aircraft cabins

Contains Synergized Etofenprox, Pyrethrin and Tetramethrin

Provides Quick Killing Action

Economical Do-It-Yourself Pest Control

Use Indoors and Outdoors

360° valve allowing upside down spraying capability

360° coverage

Flushes CockRoaches from Where They Hide

Kills Fleas – CockRoaches – Ants

Kills Bed Bugs

Kills on Contact - Kills Fast

Kills Hidden Bugs

A broad spectrum insecticide highly effective against Ants, Bed bugs, Carpet Beetles, Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Flour Beetles, Grain Beetles, Pillbugs, Silverfish, Sowbugs, and Spiders

No Oily Residue - Low Odor

**ACTIVE INGREDIENTS:**

Pyrethrins (CAS #8003-34-7).....	0.15%
Tetramethrin (CAS #7696-12-0).....	0.50%
Etofenprox (CAS #80844-07-1).....	1.00%
Piperonyl Butoxide* (CAS #51-03-6).....	1.50%

**OTHER INGREDIENTS:**..... 96.85%

Total 100.00%

\* (butylcarbityl)(6-propylpiperonyl) ether and related compounds

**KEEP OUT OF REACH OF CHILDREN**

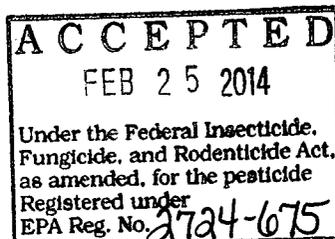
**CAUTION**

**See Side Panel For Additional Precautions**

NET CONTENTS:

EPA REG. NO. 2724-675

EPA EST. NO.



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation.

- Personal Protective Equipment (PPE):  
Applicators and other handlers must wear
- Long-sleeve shirt,
  - Long pants,
  - Shoes and socks

**User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give <b>any</b> liquid to the person.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<p>Note to Physician: Vomiting may cause aspiration pneumonia.</p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product, (including health concerns, medical emergencies or pesticide incidents), you may also call 1-800-xxx-xxxx, twenty-four (24) hours per day, seven (7) days per week.</p>	

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic organisms, including fish and aquatic invertebrates. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements.

**PHYSICAL OR CHEMICAL HAZARDS**

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL USE RESTRICTIONS AND DIRECTIONS.**

**USE RESTRICTIONS**

Do not enter or allow others to enter until sprays have dried.

Remove or cover exposed food and drinking water before application.

Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

Do not water the treated area to the point of runoff.

Do not use in aircraft cabins.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- 1) Treatment to soil or vegetation around structures;
- 2) Applications to building foundations, up to a maximum height of 3 feet

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.

To apply at the maximum application rate, spray for 24 seconds to cover an area of 5' X 10' (50 sq ft)

**USE INFORMATION:** Premium Roach Spray provides effective kill of listed pests in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use: apartment buildings, homes, hospitals, and the non-food/feed areas of hotels, industrial buildings, laboratories, mausoleums, motels, nursing homes, private residences, schools, stores, utilities warehouses, and in non-food areas of restaurants, food manufacturing, processing, and servicing establishments, and on: vessels, rail cars, aircraft (do not use in aircraft cabins), buses, trucks and trailers.

**INDOORS**

Hold container with nozzle pointed away from you. For Crack and Crevice treatment, insert supplied extension tube into actuator and apply product. Press valve down and spray surface until slightly wet (at a rate of 2 seconds to treat approximately 1 linear foot of baseboard area). Can may be sprayed upright or upside down to facilitate application.

To kill Cockroaches, Ants, Crickets, Earwigs, Firebrats, Fleas, Silverfish, Spiders, and Sowbugs: Apply as a crack and crevice or spot treatment areas where these pests crawl and hide, especially on hidden surfaces around sinks and storage areas, along and behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the on the underside of shelves, drawers, and bookcases. **Do not reapply more often than every 14 days.**

Ants: Spray around ant trails, doors and windows and other places where ants enter premises. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris.

**Fleas in Buildings:** Remove and destroy pet's old bedding and replace with clean, fresh bedding after treatment of pet areas. Apply as a crack and crevice treatment to infested areas such as pet beds, sleeping quarters of pets, around baseboards, windows and door frames, local areas of floors (under the edges of rugs and floor coverings), and between/under cushions of upholstered furniture. As a broadcast application for fleas, spray at the maximum rate of 24 seconds to cover an area of 5' X 10' (50 sq ft). Do not allow pets to reoccupy treated areas until treated surfaces have thoroughly dried. **DO NOT USE THIS PRODUCT DIRECTLY ON DOMESTIC/COMPANION ANIMALS (DOGS, CATS, PUPPIES OR KITTENS).** Treat dogs and cats with a flea and tick control product before allowing them to reenter the treated area.

**Spiders:** Apply as a crack and crevice or spot treatment along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

**Earwigs, Mole Crickets, Pillbugs, and Sowbugs:** Apply as a crack and crevice or spot treatment around doors and windows, along and behind baseboards, and in storage areas where these pests are found.

**Pantry Pests - Exposed Stages of Sawtoothed Grain Beetles, Flour Beetles (Red and Confused), and Cigarette Beetles:** Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils.

**Carpet Beetles (Black, Furniture and Varied):** Apply as a crack and crevice or spot treatment on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

**Bed Bugs –** Thoroughly inspect area of suspected bed bug infestation and note potential harborage sites or actual infestations. Remove and/or pick up clothing and other obstacles that may prevent thorough inspection or treatment. Remove and sanitize infested bedding (pillows and linens), clothing or other items.

Apply [brand name] on mattresses as a spot treatment to mattress seams, edges, and tufts of bed only. Do not use [brand name] directly on mattresses, pillows, bed linens or clothes. Do not saturate the mattress; and do not treat entire surface area of mattress. Allow mattress to dry thoroughly before replacing pillows and/or bed linens.

Bed bugs may also harbor in areas of the room away from the bed. Apply [brand name] as a crack and crevice or spot application where evidence of bed bugs occurs. This includes bed frames, box springs, inside empty drawers and clothes closets, night stands and other furniture in the room, carpet edges, high and low wall moldings (such as floor molding or window casings), wall voids, behind wall hangings and mirrors, wallpaper edges and popcorn ceilings. Remove all clothes and other articles from dressers or closets before application. Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that interior framework is treated. Apply [brand name] as a surface application to carpeting, drapes, and flooring at the rate of 16 ounces per 500 ft<sup>2</sup>. Allow all treated areas to dry thoroughly before use.

If evidence of bed bugs is found in/on mattresses, use products approved for full coverage. [Brand Name] is only recommended for spot treatments.

**OUTDOORS**

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Spray with wind if breeze is blowing.

**PESTS ON OUTSIDE SURFACES OF BUILDINGS** – To kill Ants, Crickets, Earwigs, and Sowbugs (Pillbugs): Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. For ants, spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris. Apply as a spray to outside surfaces of buildings where listed insects tend to congregate. Spray areas include: screens, window frames, eaves, porches, patios, garages and refuse dumps. Do not reapply more than every 7 days.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. **PESTICIDE STORAGE:** Do not store near heat or open flame. Store in cool dry (preferably locked) area that is inaccessible to children and animals. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

**[NOTICE: This product contains a chemical known to the State of California to cause cancer] (Basic formula only) (in red print on label)**

Wellmark International  
1501 East Woodfield Road 200W  
Schaumburg, Illinois 60173  
[URL]  
Made in USA

7/11

**SUBLABEL B – RESIDENTIAL USE**

**PREMIUM ROACH SPRAY**

For use in and around homes, garages, kennels, out buildings, barns, and apartment buildings  
 Contains Synergized Etofenprox, Pyrethrin and Tetramethrin  
 Provides Quick Killing Action  
 Economical Do-It-Yourself Pest Control  
 Use Indoors and Outdoors  
 360° valve allowing upside down spraying capability  
 360° coverage  
 Flushes CockRoaches from Where They Hide  
 Kills Fleas - CockRoaches – Ants  
 Kills Bed Bugs  
 Kills on Contact - Kills Fast  
 Kills Hidden Bugs  
 A broad spectrum insecticide highly effective against Ants, Bed Bugs, Carpet Beetles,  
 Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Flour Beetles, Grain Beetles, Pillbugs,  
 Silverfish, Sowbugs, and Spiders  
 No Oily Residue - Low Odor

**ACTIVE INGREDIENTS:**

Pyrethrins (CAS #8003-34-7).....	0.15%
Tetramethrin (CAS #7696-12-0).....	0.50%
Etofenprox (CAS #80844-07-1).....	1.00%
Piperonyl Butoxide* (CAS #51-03-6).....	1.50%
<b>OTHER INGREDIENTS:</b> .....	<u>96.85%</u>
Total	100.00%

\* (butylcarbityl)(6-propylpiperonyl) ether and related compounds

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
**See Side Panel For Additional Precautions**

**NET CONTENTS:**

EPA REG. NO. 2724-675  
 EPA EST. NO.

**PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation.

<b>FIRST AID</b>	
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give <b>any</b> liquid to the person.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<p>Note to Physician: Vomiting may cause aspiration pneumonia.</p> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product, (including health concerns, medical emergencies or pesticide incidents), you may also call 1-800-xxx-xxxx, twenty-four (24) hours per day, seven (7) days per week.</p>	

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to aquatic organisms, including fish and aquatic invertebrates. Do not apply directly to or near water. Drift and runoff may be hazardous to fish in water adjacent to treated areas. See Directions for Use for additional precautions and requirements. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

**PHYSICAL OR CHEMICAL HAZARDS**

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL USE RESTRICTIONS AND DIRECTIONS.**

**USE RESTRICTIONS**

Do not make applications during rain.

~~Do not wet articles to point of runoff or drip.~~

Do not use treated article until spray has dried.

Do not allow adults, children, or pets to enter the treated area until sprays have dried.

Remove or cover exposed food and drinking water before application.

Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

Do not water the treated area to the point of runoff.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

3) Treatment to soil or vegetation around structures;

4) Applications to building foundations, up to a maximum height of 3 feet

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.

To apply at the maximum application rate, spray for 24 seconds to cover an area of 5' X 10' (50 sq ft)

**USE INFORMATION:** Premium Roach Spray provides effective kill of pests in and on buildings and structures and their immediate surroundings. Permitted areas of use: homes, garages, kennels, out buildings, barns and apartment buildings

**INDOORS**

Hold container with nozzle pointed away from you. For Crack and Crevice treatment, insert supplied extension tube into actuator and apply product. Press valve down and spray surface until slightly wet (at a rate of 2 seconds to treat approximately 1 linear foot of baseboard area). Can may be sprayed upright or upside down to facilitate application.

To kill Cockroaches, Ants, Crickets, Earwigs, Firebrats, Fleas, Silverfish, Spiders, and Sowbugs: Apply as a crack and crevice or spot treatment to areas where these pests crawl and hide, especially on hidden surfaces around sinks and storage areas, along and behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the on the underside of shelves, drawers, and bookcases. **Do not reapply more often than every 14 days.**

Ants: Spray around ant trails, doors and windows and other places where ants enter premises. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris.

Fleas in Buildings: Remove and destroy pet's old bedding and replace with clean, fresh bedding after treatment of pet areas. Apply as a crack and crevice treatment to infested areas such as pet beds, sleeping quarters of pets, around baseboards, windows and door frames, local areas of floors (under the edges of rugs and floor coverings), and between/under cushions of upholstered furniture. As a broadcast application for fleas, spray at the maximum rate of 24 seconds to cover an area of 5' X 10' (50 sq ft). Do not allow pets to reoccupy treated areas until treated surfaces have thoroughly dried. **DO NOT USE THIS PRODUCT DIRECTLY ON DOMESTIC/COMPANION ANIMALS (DOGS, CATS, PUPPIES OR KITTENS).** Treat dogs and cats with a flea and tick control product before allowing them to reenter the treated area.

Spiders: Apply as a crack and crevice or spot treatment along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

Earwigs, Mole Crickets, Pillbugs, and Sowbugs: Apply as a crack and crevice or spot treatment around doors and windows along and behind baseboards, and in storage areas where these pests are found.

Pantry Pests - Exposed Stages of Sawtoothed Grain Beetles, Flour Beetles (Red and Confused), and Cigarette Beetles: Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils.

Carpet Beetles (Black, Furniture and Varied): Apply as a crack and crevice or spot treatment on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Bed Bugs – Thoroughly inspect area of suspected bed bug infestation and note potential harborage sites or actual infestations. Remove and/or pick up clothing and other obstacles that may prevent thorough inspection or treatment. Remove and sanitize infested bedding (pillows and linens), clothing or other items.

Apply [brand name] on mattresses as a spot treatment to mattress seams, edges, and tufts of bed only. Do not use [brand name] directly on mattresses, pillows, bed linens or clothes. Do not saturate the mattress; and do not treat entire surface area of mattress. Allow mattress to dry thoroughly before replacing pillows and/or bed linens.

Bed bugs may also harbor in areas of the room away from the bed. Apply [brand name] as a crack and crevice or spot application where evidence of bed bugs occurs. This includes bed frames, box springs, inside empty drawers and clothes closets, night stands and other furniture in the room, carpet edges, high and low wall moldings (such as floor molding or window casings), wall voids, behind wall hangings and mirrors, wallpaper edges and popcorn ceilings. Remove all clothes and other articles from dressers or closets before application. Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that interior framework is treated. Apply [brand name] as a surface application to carpeting, drapes, and flooring at the rate of 16 ounces per 500 ft<sup>2</sup>. Allow all treated areas to dry thoroughly before use.

If evidence of bed bugs is found in/on mattresses, use products approved for full coverage. [Brand Name] is only recommended for spot treatments.

11/11

**OUTDOORS**

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Spray with wind if breeze is blowing.

**PESTS ON OUTSIDE SURFACES OF BUILDINGS** - To kill Ants, Crickets, Earwigs, and Sowbugs (Pillbugs): Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. For ants, spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris. Apply as a spray to outside surfaces of buildings where insects tend to congregate. Spray areas include: screens, window frames, eaves, porches, patios, garages and refuse dumps. Do not reapply more than every 7 days.

**STORAGE AND DISPOSAL**

**PESTICIDE STORAGE:** Do not store near heat or open flame. Store in cool dry (preferably locked) area that is inaccessible to children and animals. **PESTICIDE DISPOSAL AND CONTAINER HANDLING :** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

**[NOTICE: This product contains a chemical known to the State of California to cause cancer] (Basic formula only) (in red print on label)**

Wellmark International  
1501 East Woodfield Road 200W  
Schaumburg, Illinois 60173  
[URL]  
Made in USA